

Group III-Claims 11 through 15, drawn to a method of manufacturing a turbulator, classified in class 29, subclass 727.

Group IV-Claims 16 through 20, drawn to a method of manufacturing a heat exchanger, classified in class 29, subclass 890.049.

The Examiner has found that the inventions are distinct, each from the other, because the Groups I and III inventions are related as apparatus and product made. The Examiner has also found that the inventions are distinct because the corrugated fins of apparatus claims 1 through 5 could be formed other than the roll forming method as specifically recited in method claims 11 through 15, such as a molding process to form the corrugated fins.

The Examiner has found that the inventions are distinct, each from the other, because the Groups II and IV inventions are related as apparatus and product made. The Examiner has also found that the inventions are distinct because the tube and turbulator of apparatus claims 6 through 10 could have been attached together other than brazing as specifically recited in method claims 16 through 20, such as the tube and the turbulator welded together.

The Examiner has found that the inventions are distinct, each from the other, because the Groups II and I inventions are related as combination and subcombination. The Examiner has also found that the combination as claimed does not require the particulars of the subcombination as claimed and the subcombination has utility by itself or in other combinations. The Examiner has further found that the subcombination has separate utility such as a plurality of corrugated fins each having a base extending laterally and longitudinally in a strip and the louvers are offset whereas, the combination does not.

The Examiner has found that the inventions are distinct, each from the other, because the Groups IV and III inventions are related as combination and subcombination. The Examiner has also found that the combination as claimed does not require the particulars of the subcombination as claimed and the subcombination has utility by itself or in other combinations. The Examiner has further found that the subcombination has separate utility such as having a generally planar strip having a base extending laterally and longitudinally, whereas the combination does not.

The Examiner has further found that these inventions have acquired a separate status in the art as shown by their different classification, and therefore restriction for examination purposes is proper. Applicants respectfully traverse the restriction requirement.

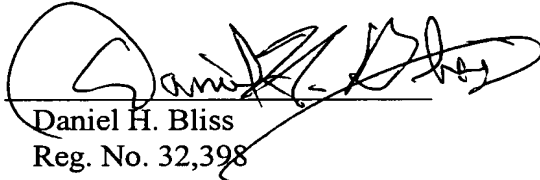
As to the invention of Group I, this invention is directed to a turbulator with offset louvers for a heat exchanger. The invention of Group II is directed to a heat exchanger including the turbulator of Group I. The invention of Group III is directed to a method of making a turbulator with offset louvers for a heat exchanger that includes the invention of claims 1 through 5. The invention of Group IV is directed to a method of making a heat exchanger that includes the invention of claims 6 through 10. The Examiner contends that the corrugated fins of apparatus claims 1 through 5 could be formed by a molding process. Applicants are not aware that such process could achieve Applicants' invention and the Examiner has not presented any evidence to support his position. The Examiner also contends that the tube and turbulator of apparatus claims 6 through 10 could have been welded together. Applicants are not aware that welding could achieve Applicants' invention and the Examiner has not presented any evidence to support his position. The inventions of Groups I, II, III, and IV are related and could all be searched in one search. Therefore, it is respectfully submitted that the restriction requirement is improper and should be withdrawn.

Applicants provisionally elect to prosecute the invention of Group I, claims 1 through 5, drawn to a turbulator apparatus.

Based on the above, it is submitted that the present application is in a condition for allowance, which allowance is solicited.

Respectfully submitted,

By:


Daniel H. Bliss
Reg. No. 32,398

BLISS McGLYNN, P.C.
2075 West Big Beaver Road, Suite 600
Troy, Michigan 48084
(248) 649-6090

Date: June 21, 2002

Attorney Docket No.: 0667.00249
Disclosure No.: 199-1883

RECEIVED
JUL -8 2002
TECHNOLOGY CENTER 3700